

ROBERT J. BELES (Cal. Bar No. 41993)
BELES & BELES LAW OFFICES
One Kaiser Plaza, Suite 2300
Oakland, California 94612-3642
Telephone: (510) 836-0100
Facsimile: (510) 832-3690
E-mail: beleslaw@yahoo.com

Attorney for Defendant
RYAN JAY ROSENTHAL

United States District Court
Northern District of California

UNITED STATES OF AMERICA,)	CR No. 4:17-CR-00133-JST-1
)	
Plaintiff,)	STIPULATION AND {PROPOSED} ORDER
)	CONTINUING CHANGE OF PLEA OR TRIAL
v.)	SETTING HEARING
)	
RYAN JAY ROSENTHAL,)	
)	
Defendant.)	
)	

Defendant RYAN JAY ROSENTHAL, by and through his counsel undersigned and the United States of America, through Assistant United States Attorney MEREDITH OSBORN, hereby stipulate and respectfully request that the Court vacate the Change of Plea or Trial Setting Hearing in the above-captioned case, currently set for Friday, March 23, 2018, at 09:30 a.m., and reset it to Friday, April 06, 2018, at 09:30 a.m.

This is the parties' second request to continue the Change of Plea or Trial Setting Hearing as to Defendant Rosenthal. The parties last appeared before the Court on January 05, 2018 for status.

Discovery from the Government is complete, and the parties are close to reaching a resolution in this case.

1 Assistant United States Attorney Meredith Osborn provided the
2 Defense with a tentative plea agreement on Wednesday, March 21,
3 2018. Continuing the Change of Plea hearing, as requested, would
4 allow the parties sufficient time to finalize the plea agreement
5 and would allow Defense Counsel reasonable time to review the plea
6 offer with the Defendant.

7 Based on the above, the parties further stipulate and agree
8 that the time between Friday, March 23, 2018 and Friday, April 06,
9 2018, should be excluded from computation of the time for
10 commencement of trial under the Speedy Trial Act and that the ends
11 of justice are served by the Court excluding such time in order to
12 allow defense counsel the reasonable time necessary for effective
13 preparation, taking into account the exercise of due diligence,
14 and continuity of counsel. 18 U.S.C. § 3161 (h) (7) (A) and (B)
15 (iv).

16 For these reasons, the Defendant, defense counsel, and the
17 government stipulate and agree that the interests of justice are
18 served by vacating the Change of Plea or Trial Setting Hearing
19 currently set for Friday, March 23, 2019 at 09:30 a.m. and
20 resetting it for Friday, April 06, 2018, at 09:30 a.m. outweigh
21 the best interests of the public and the defendant in a speedy
22 trial. 18 U.S.C. § 3161 (h) (7) (B) (iv); 18 U.S.C. § 3161 (h) (7)
23 (B) (ii).

24
25 **IT IS SO STIPULATED.**

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27
28 Respectfully submitted,

1 DATED: March 22, 2018

/s/ RJB
ROBERT J. BELES,
Attorney for RYAN ROSENTHAL

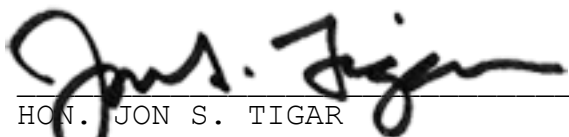
2
3
4 DATED: March 22, 2018

/s/ MO
MEREDITH OSBORN,
Assistant U.S. Attorney

ALEX G. TSE
Acting United States Attorney

8
9 **IT IS SO ORDERED.**

10 DATED: March 22, 2018 _____

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12
13 
14 HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE